

REMARKS

Claims 1 - 26 are pending in the present application. Claim 13 is being amended to correct a grammatical error. No other amendments to the claims are presently being made.

In section 2 of the Office Action, claims 1, 2, 6 – 11, 13, 14 and 18 – 23 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,168,261 to Weeks (hereinafter ‘the Weeks patent’). Applicants are traversing this rejection.

Claim 1 provides for a method of testing an electrical switchgear system. The method includes (a) applying an analog signal to a node in the electrical switchgear system, wherein the node monitors a power line signal and controls a breaker based on the power line signal, and wherein the analog signal simulates the power line signal, and (b) receiving data representing a status of the breaker.

The Weeks patent is directed toward a circuit breaker simulator (Abstract). With reference to FIG. 2, the Weeks patent discloses a system having a sensor 8, a protective relay 12, a circuit breaker control 14, a circuit breaker 6, and a breaker simulator 18 (col. 3, lines 33 – 37). When breaker simulator 18 is attached, circuit breaker 6 is electrically isolated from circuit breaker control 14 (col. 3, lines 42 – 45), and breaker simulator 18 simulates the operation of circuit breaker 6 (col. 3, lines 46 – 48). More specifically, when a test is conducted using breaker simulator 18, circuit breaker 6 is disconnected from the power grid, and breaker simulator 18 is then plugged into a receptacle 24 so that all primary circuit breaker functions are redirected to breaker simulator 18 (col. 4, lines 53 – 58). Breaker simulator 18 receives signals from protective relay 12, and outputs a reclose signal to protective relay 12 (col. 4, lines 4 – 14).

The Office Action suggests that (a) breaker simulator 18 of the Weeks patent performs an operation of applying an analog signal to breaker control 14, and (b) that an analog signal from breaker simulator 18 simulates a power line signal. Applicants respectfully disagree.

As mentioned above, breaker simulator 18 simulates the operation of circuit breaker 6. Further, the Weeks patent explains that breaker simulator 18 receives signals from protective

relay 12, and outputs a reclose signal to protective relay 12 (col. 4, lines 4 – 14). **Breaker simulator 18 does not provide a signal that simulates a power line signal.** Consequently, the Weeks patent does not disclose applying an analog signal ... wherein said **analog signal simulates said power line signal**, as recited in claim 1.

The Office Action suggests that the Weeks patent discloses receiving data representing a status of said breaker through interface 8. Applicants respectfully disagree.

The Weeks patent, with reference to FIG. 1, explains that sensors 8 monitor current through transmission lines 2, 3 and 4 (col. 3, lines 7 – 10). Current-level information from sensors 8 is evaluated by protective relays 12, which may provide a trip signal to breaker control 14 to open or reclose circuit breakers 6 (col. 3, lines 12 – 21). Thus, sensors 8 monitor current through transmission lines 2, 3 and 4. Sensors 8 do not receive or provide data representing status of circuit breakers 6. Moreover, as also mentioned above, when a test is conducted using breaker simulator 18, circuit breaker 6 is disconnected from the power grid. Since circuit breaker 6 is disconnected from the power grid, there is no provision for obtaining status of circuit breaker 6. Whereas (a) sensors 8 do not receive or provide data representing status of circuit breakers 6, and (b) circuit breaker 6 is disconnected from the power grid, and so, there is no provision for obtaining status of circuit breaker 6, the Weeks patent does not disclose **receiving data representing a status of said breaker**, as is also recited in claim 1.

For the foregoing reasons, Applicants submit that the Weeks patent does not anticipate claim 1.

Claims 2 and 6 – 11 depend from claim 1. At least because of this dependence, claims 2 and 6 – 11 are all novel over the Weeks patent.

Claim 13 provides an arrangement for testing an electrical switchgear system. Claim 13 includes recitals similar to those of claim 1, as described above. Thus, claim 13, for reasoning similar to that provided in support of claim 1, is novel over the Weeks patent.

Claims 14 and 18 - 23 depend from claim 1. At least because of this dependence, claims 14 and 18 - 23 are all novel over the Weeks patent.

Applicants respectfully request reconsideration and withdrawal of the section 102(b) rejection of claims 1, 2, 6 - 11, 13, 14 and 18 - 23.

In section 4 of the Office Action, claims 3 - 5, 12, 15 - 17 and 24 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Weeks patent in view of U.S. Patent No. 5,737,168 to Baker (hereinafter "the Baker patent"). Applicants are traversing this rejection.

Claims 3 - 5 each depend from claim 1, and introduce a further feature of the analog signal. The Office Action recognizes that the Weeks patent does not disclose these features, and so, the Office Action introduces the Baker patent, and in particular, cites a passage at col. 11, lines 58 - 59.

The Baker patent, at col. 11, lines 58 - 59, describes a test voltage 66. Referring to FIG. 3, the Baker patent explains that (a) a line one signal 50 outputted by a bridge rectifier 204 is a DC voltage, and (b) line one signal 50 is converted into test voltage 66 by sealing circuit 332 (col. 11, lines 45 - 49). Therefore, test voltage 66 is also a DC voltage. Whereas test voltage 66 is a **DC voltage** test voltage 66 is not an **analog signal**. Consequently, neither of the Weeks patent nor the Baker patent discloses or suggests the features of the analog signal of any of claims 3 - 5. Thus, claims 3 - 5 are all patentable over the cited combination of the Weeks and Baker patents.

Claim 12 discloses a method of testing an electrical switchgear system. The method includes, *inter alia*, (a) applying a first analog signal to a first node in the electrical switchgear system, wherein the first node monitors a first power line signal and controls a first breaker based on the first power line signal, and wherein the first analog signal simulates the first power line signal, (b) receiving data from the first node representing a status of the first breaker, and (c) that the first analog signal has a magnitude of less than or equal to about 10% of a magnitude of the first power line signal. Thus, claim 12 includes recitals similar to those of claim 1 and 3. For reasoning similar to that provided above in support of claims 1 and 3, Applicants submit that claim 12 is patentable over the cited combination the Weeks and Baker patents.

Claims 15 – 17 depend from claim 13, and further include recitals similar to those of claims 3 – 5, that introduce further features of the analog signal. For reasoning similar to that provided above in support of claims 13 and 3 – 5, Applicants submit that claims 15 – 17 are patentable over the cited combination of the Weeks and Baker patents.

Claim 24 includes recitals similar to those of claim 12, as described above. Thus, for reasoning similar to that provided above in support of claim 12, Applicants submit that claim 224 is patentable over the cited combination of the Weeks and Baker patents.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 3 – 5, 12, 15 – 17 and 24.

In section 5 of the Office Action, claim 25 is rejected under 35 U.S.C. 103(a) as being unpatentable over the Weeks patent in view of U.S. Patent No. 6,798,209 to LaVoie et al. (hereinafter “the LaVoie et al. patent”). Applicants are traversing this rejection.

Claim 25 provides for a storage medium having instructions for controlling a processor for testing an electrical switchgear system to (a) apply an analog signal to a node in said electrical switchgear system, wherein said node monitors a power line signal and controls a breaker based on said power line signal, and wherein said analog signal simulates said power line signal, and (b) receive data representing a status of said breaker. For reasoning similar to that provided above in support of claim 1, Applicants submit that the Weeks patent does not disclose to (i) apply an analog signal ... wherein said analog signal simulates said power line signal, and (ii) receive data representing a status of said breaker, both of which are recited in claim 25. Applicants also submit that the LaVoie et al. patent does not make up for the deficiencies of the Weeks patent, as the Weeks patent relates to claim 25. Accordingly, Applicants submit that claim 25 is patentable over the cited combination of the Weeks and LaVoie et al patents.

Reconsideration and withdrawal of the section 103(a) rejection of claim 25 are respectfully requested.

In section 6 of the Office Action, claim 26 is rejected under 35 U.S.C. 103(a) as being unpatentable over the Weeks patent in view of the Baker and LaVoie patents. Claim 26 includes recitals similar to those of claim 25, as described above, and further includes a recital similar to that of claim 3. Applicants submit that the cited combination of references does not disclose or suggest (A) to (i) apply a first analog signal ... wherein said first analog signal simulates a power line signal, and (ii) receive data representing a status of a first breaker, and (B) wherein said analog signal has a magnitude of less than or equal to about 10% of a magnitude of the power line signal, as are recited in claim 26. Accordingly, Applicants submit that claim 26 is patentable over the cited combination of the Weeks and LaVoie et al patents.

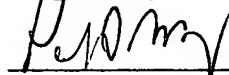
Reconsideration and withdrawal of the section 103(a) rejection of claim 26 are respectfully requested.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Date

8/31/05

Respectfully submitted,



Paul D. Greeley, Esq.

Reg. No. 31,019

Attorney for the Applicants

Ohlandt, Greeley, Ruggiero & Perle, L.L.P.

One Landmark Square, 10th Floor

Stamford, CT 06901-2682

Tel: 203-327-4500

Fax: 203-327-6401